

## REMARKS

After entry of this amendment, claims 1-51 remain pending. In the present Office Action, claims 1-5, 14-20, and 22-23 were rejected under 35 U.S.C. § 102(b) as being anticipated by James L. Turley's Advanced 80386 Programming Techniques ("Turley"). Claims 6-7, 24-25, and 32-33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Turley in view of Khalidi et al., U.S. Patent No. 5,479,627 ("Khalidi"). Claims 8-13 and 26-31 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Turley in view of Schrofer, U.S. Patent No. 4,682,284 ("Schrofer"). Claim 21 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Turley in view of Park, U.S. Patent No. 6,021,484 ("Park"). Applicants respectfully traverse these rejections and request reconsideration.

### Claims 1-33

Applicants respectfully submit that each of claims 1-33 recite combinations of features not taught or suggested in the cited art. For example, claim 1 recites a combination of features including: "a first storage location configured to store a segment selector identifying a segment descriptor including a first operating mode indication, a second operating mode indication, and one or more indications that identify a segment described by said segment descriptor as a code segment; ... wherein said enable indication, said first operating mode indication, and said second operating mode indication are indicative of a default address size".

The Office Action alleges that Turley teaches the segment descriptor. More particularly, the Office Action alleges that Turley teaches the first and second operating mode indications at page 49, table: A segment descriptor; pages 47-48, paragraphs 5-2, page 50, Figure 2-2; page 51-52; page 53, paragraph 3; and page 54, table. With such general recitations of teachings, it is unclear exactly what in Turley's segment descriptor is alleged to be the first and second operating mode indications. However, the table labeled "A segment descriptor" on page 49 merely generally describes a segment descriptor, and offers no details. Page 47-48, paragraphs 5-2 generally indicate that segments have attributes, including what the segment is used for (code, data, stack) and

privilege level. Additionally, this section generally indicates that a segment descriptor describes the segment. Figure 2-2 on page 50 is a diagram illustrating the contents of Turley's segment descriptor, which contents are described on pages 51-52.

Of the information in Turley's segment descriptor, only the D bit appears to have anything to do with default address size (see Turley, page 52, paragraph 2). Turley only discusses the D bit as describing the default operand size, but Applicants believe that the 80386 uses the D bit for both address size and operand size (see e.g., Intel, page 11-13, paragraph 3). The D bit is described at page 3, paragraph 3 as well. However, the D bit alone cannot teach or suggest both a first operating mode indication and a second operating mode indication. See also the table on page 54 of Turley, which indicates that the size of operands within the segment is determined by 1 bit. Applicants submit that 1 bit cannot teach or suggest both the first operating mode indication and the second operating mode indication.

For at least the above stated reasons, Applicants submit that claim 1 is patentable over the cited art. Claims 2-22 depend from claim 1 and thus are patentable over the cited art for at least the above stated reasons as well. Each of claims 2-22 recite additional combinations of features not taught or suggested in the cited art.

Claim 23 recites a combination of features including: "determining a default address size in response to an enable indication in a first storage location, a first operating mode indication in a segment descriptor, and a second operating mode indication in said segment descriptor, wherein said segment descriptor further includes one or more indications that identify a segment described by said segment descriptor as a code segment". The teachings of Turley highlighted above with regard to claim 1 are also alleged to teach the features of the segment descriptor recited in claim 23. The teachings of Turley fail to teach or suggest the above highlighted features as well. For at least the above stated reasons, Applicants submit that claim 23 is patentable over the cited art. Claims 24-33 depend from claim 23 and thus are patentable over the cited art for at least the above stated reasons as well. Each of claims 24-33 recite additional combinations of

features not taught or suggested in the cited art.

New Claims

Applicants respectfully submit that each of new claims 34-51 recite combinations of features not taught or suggested in the cited art. For example, claim 34 recites a combination of features including: "native instructions which, when executed, perform one or more operations defined for a non-native instruction using a default address size, the default address size determined in response to an enable indication in a first storage location, a first operating mode indication in a segment descriptor, and a second operating mode indication in said segment descriptor, wherein said segment descriptor further includes one or more indications that identify a segment described by said segment descriptor as a code segment". Claims 35-51 depend from claim 34 and recite additional combinations of features not taught or suggested in the cited art.

Claim Objection

Claim 32 was objected to. Applicants respectfully submit that claim 32 as amended overcomes the objection.

## CONCLUSION

Applicants submit that the application is in condition for allowance, and an early notice to that effect is requested.

If any extensions of time (under 37 C.F.R. § 1.136) are necessary to prevent the above referenced application(s) from becoming abandoned, Applicant(s) hereby petition for such extensions. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5500-54701/LJM.

Also enclosed herewith are the following items:

- Return Receipt Postcard
- Petition for Extension of Time
- Please debit the above deposit account in the amount of \$324 for fees (\$324 for 18 excess claims over 20).
- Other:

Respectfully submitted,



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